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Attorneys for Plaintiffs
ALLERGAN USA, INC. and
ALLERGAN INDUSTRIE, SAS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALLERGAN USA, INC., and
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC.,
MEDICIS PHARMACEUTICAL CORP.,
VALEANT PHARMACEUTICALS
NORTH AMERICA LLC,
VALEANT PHARMACEUTICALS
INTERNATIONAL, VALEANT
PHARMACEUTICALS
INTERNATIONAL, INC. and
GALDERMA LABORATORIES, L.P.

Defendants.

Case No. 8:13-cv-01436 AG (JPRx)

**DECLARATION OF ELIZABETH
M. FLANAGAN IN SUPPORT OF
APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

Date: January 12, 2015

Time: 10:00 a.m.

Ctrm: 10D

Judge: Hon. Andrew J. Guilford

1 I, Elizabeth M. Flanagan, declare as follows:

2 1. I, Elizabeth M. Flanagan, declare and state that the following is true to
3 the best of my knowledge, information and belief and I make this declaration in
4 support of Allergan's Application to File Under Seal:

5 2. I am an attorney representing Plaintiffs Allergan USA, Inc. and
6 Allergan Industrie SAS ("Allergan"). I have personal knowledge of the matters
7 stated in this declaration and if called upon to testify in this action as to the matters
8 set forth in this declaration, I could and would competently testify thereto. As to
9 those matters stated on information and belief, I have carefully examined the
10 information and reasonably believe it to be true.

11 3. On December 16, 2014, I spoke with Defendants' counsel, William
12 Schmedlin, of Patterson Belknap Webb & Tyler LLP, in person, and notified him of
13 Allergan's intent to seal Defendants' documents designated confidential under the
14 Protective Order. Mr. Schmedlin agreed with Allergan's proposal to file Defendants'
15 confidential information under seal.

16 4. I declare under penalty of perjury under the laws of the United States
17 that the foregoing is true and correct.

18 Executed on December 16, 2014 at Wilmington, Delaware.

19
20 FISH & RICHARDSON P.C.

21
22 By: /s/ Elizabeth M. Flanagan
23 Elizabeth M. Flanagan

24 Attorneys for Plaintiffs
25 ALLERGAN USA, INC. and
26 ALLERGAN INDUSTRIE, SAS
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on December 16, 2014 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Elizabeth M. Flanagan
Elizabeth M. Flanagan